

# EXHIBIT 9

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

LACI N. BLANCHARD,  
Individually, and as next  
friend of W.B., surviving  
minor child of RONNIE P.  
BLANCHARD, JR.,

Plaintiff,  
Civil Action No.  
v. 22-CV-2420  
  
SANARE ENERGY PARTNERS LLC,  
et al.,  
  
Defendants.

\* \* \* \* \*

VIDEOTAPED DEPOSITION OF:

MATTHEW JAMES GAUDET

Tuesday, March 11, 2025  
9:13 a.m. (CST)

At the Law Offices of:  
JONES WALKER  
201 St. Charles Avenue  
New Orleans, Louisiana 70170

Reported by:

YOLANDA J. PENA, RPR  
Certified Court Reporter  
No. 2017002 in and for the  
State of Louisiana

Page 2

1

## A P P E A R A N C E S

2

3 FOR THE PLAINTIFF:

4 ARNOLD & ITKIN LLP  
(BY: ALEC PARADOWSKI, ESQ.)  
5 6009 MEMORIAL DRIVE  
HOUSTON, TEXAS 70802  
6 (713) 222-3800  
aparadowski@arnolditkin.com

7

- AND -

8

DRENNAN LANGDON & FIDEL, LLP  
(BY: JOSEPH DRENNAN, ESQ.) [via Zoom]  
1001 MAIN STREET, SUITE 706  
10 LUBBOCK, TEXAS 79401

11

FOR ALL COAST, LLC:

12

THE MOELLER FIRM  
(BY: DAVID K. SMITH, ESQ.) [via Zoom]  
(BY: KASSIE RICHBOURG, ESQ.) [via Zoom]  
14 650 POYDRAS STREET, SUITE 2516,  
NEW ORLEANS, LOUISIANA 70130  
15 (504) 308-1363  
david@moellerfirm.com

16

17

FOR HARDY OILFIELD SERVICES, LLC:

18

MARON MARVEL BRADLEY ANDERSON & TARDY LLC  
(BY: DAVID BARFIELD, ESQ.) [via Zoom]  
201 ST. CHARLES AVENUE, SUITE 2411  
20 NEW ORLEANS, LOUISIANA 70170  
21 (601) 960-3104  
dbarfield@maronmarvel.com

22

23

24

25

Page 3

1

## A P P E A R A N C E S (Continued)

2

3

FOR NPC LAND &amp; MARINE, LLC:

4

LABORDE SIEGEL  
(BY: CARLA LASSABE, ESQ.) [via Zoom]  
5151 SAN FELIPE, SUITE 750  
HOUSTON, TEXAS 77056  
(832) 255-6000  
classabe@labordesiegel.com

8

9

FOR SANARE ENERGY PARTNERS LLC:

10

HALL MAINES LUGRIN  
(BY: ROBERT E. FREEHILL, ESQ.)  
(BY: CAROLINE E. BOSSIER, ESQ.)  
2800 POST OAK BOULEVARD, 64TH FLOOR  
HOUSTON, TEXAS 77056  
(713) 871-9000  
rfreehill@hallmaineslugrin.com  
cbossier@hallmaineslugrin.com

14

15

FOR SBS ENERGY SERVICES, LLC:

16

LEBAS LAW FIRM ALPC  
(BY: HENRY H. LEBAS, ESQ.)  
2 FLAGG PLACE, SUITE 1  
LAFAYETTE, LOUISIANA 70508  
(337) 236-5500  
hlebas@lebaslaw.com

20

21

FOR SUPERIOR ENERGY SERVICES NORTH AMERICA  
SERVICES, INC. AND WARRIOR ENERGY SERVICES  
CORPORATION:

23

BRADLEY ARANT BOULT CUMMINGS LLP  
(BY: ROSS A. DARVILLE, ESQ.) [via Zoom]  
600 TRAVIS STREET, SUITE 5600  
HOUSTON, TEXAS 77002  
(713) 576-0375  
rdarville@bradley.com

Page 4

1

## A P P E A R A N C E S (Continued)

2

3

ALSO PRESENT:

4

XAVIER BOYD, VIDEOGRAPHER

5

ROBERT BRAY [via Zoom]

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1	I N D E X	Page 5
2		
3		PAGE
4	LIST OF EXHIBITS.....	6
5	EXAMINATION BY:	
6	MR. PARADOWSKI.....	7, 117, 159
7	MR. FREEHILL.....	72, 120, 162
8	MR. DARVILLE.....	101
9	MR. BARFIELD.....	103
10	MS. RICHBOURG.....	107
11	MR. LEBAS.....	121
12	REPORTER'S PAGE.....	174
13	REPORTER'S CERTIFICATE.....	175
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1	LIST OF EXHIBITS	Page 6
2	Exhibit No. 120.....	59
3	(SBS00529; Accident Investigation Program)	
4	Exhibit No. 121.....	61
5	(Statement of Mr. Gaudet)	
6	Exhibit No. 122.....	93
7	(Mr. Foley email; 3/6/22; Subject: Drawing)	
8	Exhibit No. 123.....	97
9	(Deposition transcript of Richard Coleman; 2/13/25)	
10	Exhibit No. 124.....	98
11	(Deposition transcript of Michael Granger; 1/28/25)	
12		
13	ATTACHMENTS	
14	Attachment No. 1.....	107
15	(AC CONFIDENTIAL 0163; HSE Orientation Topics)	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

Page 55

1 Q. So let me see if I can show you a picture here  
2 because I want to make sure that I've kind of got a  
3 good sense of -- I know this is nighttime, Mr. Gaudet.  
4 But when we look at this photo here, where you were  
5 physically located, can we see that on this picture?

6 A. No.

7 Q. So --

8 A. You have to back up.

9 Q. I see. So --

10 A. I'm on the barge.

11 Q. That's what I was trying to get at. Okay.

12 So you're on the liftboat --

13 A. Yes.

14 Q. -- while this is happening?

15 And so if you had to estimate the distance  
16 between you and the hydraulic workover unit while  
17 Ronnie is unhooking the crane, how far is that?

18 A. A hundred feet, maybe.

19 THE REPORTER: I'm sorry?

20 A. A hundred feet, maybe.

21 BY MR. PARADOWSKI:

22 Q. And when Ronnie unhooks the crane, can you  
23 tell me what you saw happen next?

24 A. Well, he unhooked one shackle on the spreader  
25 bar. He bent down and hooked the other shackle on the

Page 56

1 spreader bar. He stood up and looked at me like he

2 will say something, and then it fell over, like,

3 seconds after he unhooked it.

4 Q. And you mentioned that kind of right before it

5 fell over, you actually made eye contact with Ronnie?

6 A. Yeah, he was looking right at me. I had the

7 next piece of equipment to hook up.

8 Q. And so -- and I know this is hard, Mr. Gaudet.

9 But you actually watched the hydraulic workover unit

10 tip over and fall into the water?

11 A. That's correct. It fell and one of the arms

12 hit the front of the barge, and then it went straight

13 down.

14 Q. Could you hear -- and I have to ask these

15 questions, Mr. Gaudet. I don't like making you relive

16 this, but new question, new line.

17 Did you hear Mr. Blanchard screaming or

18 yelling for help at all?

19 A. It was very fast.

20 Q. It was? Okay.

21 Did you see Mr. Blanchard actually go into the

22 water?

23 A. No, I couldn't see. I was too far from the

24 edge.

25 Q. I got it. So at some point, the --

Page 57

1 A. I lost eye contact.

2 Q. Right. The hydraulic workover unit, as it  
3 gets down closer to the water, the edge of the barge  
4 blocks your vision so you can't actually see it --

5 A. Yeah, I was about -- at least 50 feet from the  
6 handrail.

7 Q. Do you know -- and it's okay if you don't.

8 But do you know whether any of the other SBS  
9 crew members actually saw Ronnie go into the water?

10 A. Not that I know of. I don't know where Travis  
11 was, and Lance was in the dog house. And I don't know  
12 where the other guys were.

13 Q. Once the hydraulic workover unit went into the  
14 water, what did you and the rest of the SBS crew do?

15 A. As soon as it went down, I ran straight to the  
16 handrail, and I had to stop myself from going get him.  
17 When I looked at that crane, I was like, that's -- I'm  
18 not going to die too.

19 Q. So --

20 A. I swim like a fish.

21 Q. Your first thought was, "I'll just go get  
22 Ronnie. I can save him"?

23 A. Yeah.

24 Q. And then you go and you look over the  
25 handrail, and the current is too strong, and if you

Page 119

1 Q. Yeah. I mean, when you were working for SBS,  
2 every single day that you were on the project, you  
3 fought to make sure that the work was done as safely as  
4 it could be done, right?

5 A. Yes.

6 Q. And on this particular project where Ronnie  
7 Blanchard died, SBS made intentional choices to cut  
8 corners that made the job more dangerous; is that  
9 right?

10 A. That -- yes.

11 Q. Last thing, do you still have the --  
12 Exhibit 121, the statement to the labor board, in  
13 front of you?

14 A. Yes.

15 Q. I just want to follow up. There -- I meant to  
16 ask you this towards the end -- or I meant to ask you  
17 this earlier and forgot.

18 There's the paragraph towards the end that  
19 says, "I was on the jack-up standing on top of the  
20 closing unit." Do you see that?

21 A. Yes.

22 Q. So it says, [As read]: "I was on the jack-up  
23 standing on top of the closing unit, looking at Ronnie  
24 Blanchard. I watched him unhook one shackle from the  
25 spreader bar. Then he unhooked the other shackle from

Page 120

1 the unit. He stood up as if he was going to say

2 something. Then while making deliberate eye contact,

3 the unit gave way. Ronnie was looking at me directly

4 in the eyes the whole time it was following --

5 falling." Do you see that?

6 A. Yes.

7 Q. What emotions did you see on Mr. Blanchard's

8 face as the hydraulic workover unit was falling, sir?

9 A. Shock. His eyes just opened up. It -- it's

10 hard. It happened real fast.

11 MR. PARADOWSKI: That's all the  
12 questions that I have for you. I appreciate  
13 your time.

14 THE WITNESS: Thank you.

15 MR. FREEHILL: I just have a couple  
16 quick questions for you, sir.

17 RE-EXAMINATION

18 BY MR. FREEHILL:

19 Q. That Exhibit 121 that's in front of you, all  
20 the information in that statement is true and correct,  
21 right?

22 A. 100 percent.

23 Q. And you wrote that based on your personal  
24 recollection and what you witnessed on March 25th,  
25 2022?